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9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 TRUSTEES OF THE ELECTRICAL
13 WORKERS HEALTH AND WELFARE
14 TRUST; TRUSTEES OF THE
15 ELECTRICAL WORKERS PENSION
16 TRUST; AND TRUSTEES OF THE LAS
VEGAS ELECTRICAL JOINT
APPRENTICESHIP AND TRAINING
TRUST FUND,

17 Plaintiffs,

18 vs.

19 WILLIAMS BROTHER, INC., a Nevada
20 corporation,

21 Defendant.

Case No. 2:12-cv-00812-MMD-PAL

STIPULATED/CONSENT JUDGMENT

22 Williams Brother, Inc. ("Williams"), hereby stipulates and consents to entry of judgment
23 in favor of Plaintiffs, Trustees of the Electrical Workers Health and Welfare Trust, Trustees of the
24 Electrical Workers Pension Trust, and Trustees of the Las Vegas Electrical Joint Apprenticeship
25 and Training Trust Fund (collective "Trust Funds"), and against Williams in the total sum of
26
27
28

1 \$32,785 for delinquent employee benefit contributions and related costs and fees owed under the
2 Employee Retirement Income Security Act of 1974 ("ERISA").

3 The parties have stipulated and therefore the Court finds:

4 1. Williams is signatory to and bound by the terms of a collective bargaining
5 agreement ("CBA") with the International Brotherhood of Electrical Workers Local No. 357
6 ("Union"), in which Williams agreed to abide by the trust agreements establishing the respective
7 Trust Funds and any amendments thereto ("Trust Agreements").

8 2. Under the CBA and the Trust Agreements, Williams is obligated to pay employee
9 benefit contributions to the Trust Funds on behalf of Williams's bargaining unit employees
10 represented by the Union.

11 3. Based on a contract compliance review ("Audit") for the period of September 1,
12 2009, through May 31, 2012, Williams owes the Trust Funds \$32,785, which includes employee
13 benefit contributions, liquidated damages, interest, audit fees, and attorney's fees to date.

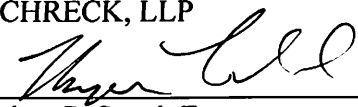
14 4. This Stipulated/Consent Judgment is entered into by and between Williams and the
15 Trust Funds for employee benefit contributions and related costs and fees owed to the Trust Funds
16 by ERISA.

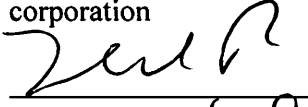
17 Dated: ^{December} ~~November~~ 14, 2012

18 Dated: ^{Dec.} ~~November~~ 11, 2012

19 BROWNSTEIN HYATT FARBER
20 SCHRECK, LLP

21 WILLIAMS BROTHER, INC., a Nevada
22 corporation

23 
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Attorneys for Plaintiffs

23 
24 Name: Michael Poeh
25 Title: President
26 Telephone: _____
27 Facsimile: _____

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JUDGMENT

Judgment is hereby entered against Williams Brother, Inc., a Nevada corporation and in favor of the Trustees of the Electrical Workers Health and Welfare Trust, Trustees of the Electrical Workers Pension Trust, and Trustees of the Las Vegas Electrical Joint Apprenticeship and Training Trust Fund in the amount of \$32,785.

Dated this 12th day of February, 20¹³.



U.S. DISTRICT COURT JUDGE

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614
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1 STATE OF NEVADA)
2 COUNTY OF CLARK) SS.

3 MICHAEL PERK, being first duly sworn, deposes and says:

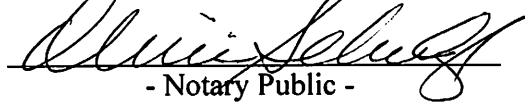
4 That he/~~she~~ is the Pres. of Williams Brother, Inc., a Nevada corporation, and is
5 duly authorized to execute this document; that he/she has read the foregoing Stipulated/Consent
6 Judgment and knows the contents thereof; that the same is true of his/her own knowledge, except
7 for those matters therein stated on information and belief, and as to those matters he/she believes
8 them to be true.

9 
10 _____

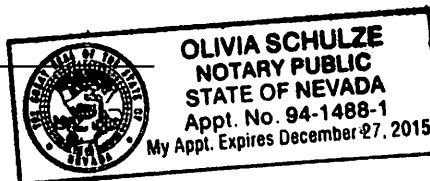
Affiant

11 Subscribed and Sworn to before me

12 this 11th day of Dec., 2012.

13 
14 _____
15 - Notary Public -

16 My commission expires:



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